

217/782-2113

CONSTRUCTION PERMIT - NESHAP SOURCE

PERMITTEE

Packaging Personified, Inc.
Attn: Joseph Imburgia
246 Kehoe Boulevard
Carol Stream, Illinois 60188

Application No.: 06020062

I.D. No.: 043020ACJ

Applicant's Designation:

Date Received: February 14, 2006

Subject: Flexographic Presses

Date Issued: October 10, 2006

Location: 246 Kehoe Boulevard, Carol Stream

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of modifications of the flexographic printing material usage, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The wide-web flexographic printing is subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants (HAP) emissions from the printing operations, 40 CFR 63, Subparts A and KK. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.
- 2a. This permit is based on the source meeting the criteria for an area source (i.e. less than 10 tons per year of individual HAP and 25 tons per year of combined HAP for each rolling 12-month period).
- b. The Permittee shall meet the recordkeeping requirements in 40 CFR 63.829(d) and this permit to demonstrate the area source status.
- c. The Permittee shall meet the reporting requirements in 40 CFR 63.830(b)(1) and 63.9(b).
3. This permit is issued based upon the source being subject to the VOM control requirements of 35 Ill. Adm. Code 218, Subpart H: "Flexographic and Rotogravure Printing":
 - a. For the 2 controlled presses, the Permittee shall utilize a regenerative thermal oxidizer (RTO) which reduces captured VOM by at least 90%, meeting the requirements of 35 Ill. Adm. Code 218.401(c)(2).
 - b. For the 2 controlled presses, the Permittee shall utilize a regenerative thermal oxidizer (RTO) and capture system that provides at least an overall reduction of VOM emissions of at least 94%. This limit is as requested by the Permittee and exceeds 35 Ill. Adm. Code 218.401(c)(4)(C).

- c. For the 2 uncontrolled presses, the Permittee shall meet 35 Ill. Adm. Code 218.401(a) by not applying flexographic coatings or inks which exceed the following:
 - i. 40% VOM by volume of the coating and ink (minus water and any other exempt compounds from VOM), or
 - ii. 25% VOM by volume of the volatile content of the coating and ink.
- d. The coatings and inks shall be tested by the VOM content test methods of 25 Ill. Adm. Code 218.105(a).

4. Emissions and operation of all printing shall not exceed the following limits:

<u>Emission Unit</u>	<u>VOM* Usage</u>		<u>VOM* Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Presses #1 and #2	400	2.00	400	2.00
Presses #5 and #6	60,000	300.00	3,600	18.00
Cleanup and Other Solvents	980	4.90	980	4.90

* Volatile Organic Material

These limits are based on the maximum material usage at the maximum VOM content and an overall control efficiency of 94% for presses #5 & #6. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 10 tons per year of any single HAP and 25 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of 112(g) of the Clean Air Act.
6. The regenerative thermal oxidizer (RTO) shall be in operation at all times that Press 5 or Press 6 is in operation. The regenerative thermal oxidizer shall not be seasonally shut down as would be allowed in 35 Ill. Adm. Code 218.107.
- 7a. The regenerative thermal oxidizer (RTO) shall be equipped with a USEPA approved continuous monitoring device that will measure the combustion chamber temperature. It shall be installed, calibrated, maintained and operated according to vendor specifications at all times the afterburner is in use.
- b. The RTO combustion chamber temperature shall not be below the average temperature measured during the most recent stack test that demonstrated that the operation was in compliance.

- c. The regenerative thermal oxidizer capture and control system shall be operated in a manner consistent to good air pollution control practices.
 - d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
8. Within 60 days of written request by the Illinois EPA, the destruction efficiency and the overall reduction efficiency of the regenerative thermal oxidizer system shall be measured according to the procedures in 35 Ill. Adm. Code 218.105 (c) through (f) by an approved testing service, during conditions which are representative of maximum operation.
9. The Permittee shall maintain daily records of the following items:
- a. Names of inks used and their VOM content, as applied (lbs/gallon) separately for controlled and uncontrolled presses.
 - b. Control device monitoring data.
 - c. A log of operating time for the capture system, control device, monitoring equipment and the associated printing line.
 - d. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
10. The Permittee shall maintain monthly records of the following items:
- a. Names and amounts of inks used (gallons/month) and their VOM and HAP content, as applied separately for controlled and uncontrolled presses (lbs/gallon).
 - b. Names and amounts of solvents used for the ink dilution (gallons/month) and their VOM and HAP content (lbs/gallon).
 - c. Names and amounts of solvents used for clean-up (gallons/month) and their VOM and HAP content (lbs/gallon).
 - d. VOM and HAP emissions for preceding month (tons/month) and preceding 12 months (tons/year) with supporting calculations.
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records

retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

12. If there is an exceedance of the requirements of this permit, as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JPB:psj

cc: Region 1